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Via ECF

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The Honorable Susan D. Wigenton  
United States District Judge  
United States District Court for the District of New Jersey  
Martin Luther King Building & United States Courthouse  
50 Walnut Street, Room 5C  
Newark, NJ 07101

Re: *United States v. Robert Rothman*, Dkt. No. 12-CR-210 (SDW)

Dear Judge Wigenton:

We represent Defendant Robert Rothman, who is currently scheduled to be sentenced on April 5, 2016. We respectfully request that his sentencing be adjourned until the week of May 9 or later. We have discussed the matter with Bryan Bughman, Esq., of the Department of Justice, Antitrust Division, who indicated that the Government has no objection.

Mr. Rothman has served as a significant cooperating witness for the Government. Several of the codefendants against whom he cooperated are scheduled to be sentenced in mid-to late-April. It would be appropriate for Mr. Rothman to be sentenced after those individuals. In addition, a standing order in this District requires that defendants receive their draft PSRs at least fifty days prior to sentencing. Mr. Rothman received his draft report on February 29, which is only thirty-six days prior to his current sentencing date. An adjournment would considerably ease the process of preparing objections to the PSR, if any, and preparing Mr. Rothman's sentencing submission. Finally, as an observant member of the Jewish faith, Mr. Rothman respectfully requests that his sentencing not take place during the holiday of Passover, which runs from April 22 to April 30.

We appreciate the Court's consideration.

Respectfully submitted,

/s/

Robert J. Cleary

cc: Bryan Bughman, Esq.